

You could separate options into “procedural” options and “substantive” options. This identifies a “substantive” option.

**404(c) Substantive Option:  
Geographic Area by Type of Activity**

	<b>Metallic sulfide mining</b>	<b>Activities other than metallic sulfide mining</b>
<b>Zone 1 (probably less than a million acres):</b> Land <b>inside</b> exterior boundaries drawn to encompass waters and wetlands that may be used as discharge sites of dredged or fill material associated with metallic sulfide mining (including Pebble & facilities (road, millsite, etc), and perhaps Kemuk & facilities)	404(c) Action:  EPA could <b>prohibit</b> discharge of dredged or fill material associated with metallic sulfide mining.	404(c) Action:  EPA could <b>restrict</b> discharge of dredged or fill material associated with activities other than metallic sulfide mining, and does so based on some sort of compatibility test similar to a refuge compatibility test, but tailored to 404(c) concerns.
<b>Zone 2 (probably about 5 million acres surrounding land within Zone 1):</b> Land <b>outside</b> exterior boundary describe above but <b>inside</b> exterior boundary of latest draft refuge map of Kvichak and Nushagak drainages (about 6 million acres).	404(c) Action:  EPA could <b>take a position</b> that in the event of discovery of metallic sulfide deposits, EPA will evaluate for purposes of future 404(c) action.	404(c) Action (same as above):  EPA could <b>restrict</b> discharge of dredged or fill material associated with activities other than metallic sulfide mining. EPA does so based on some sort of compatibility test, similar to a refuge compatibility test, but tailored to 404(c) concerns.